

The Hon. James P. Donohue  
Chief Magistrate Judge

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

CASE NO. 2:17-CV-00218-RSM-JPD

Daniel Ramirez Medina,

Petitioner,

v.

U.S. DEPARTMENT OF HOMELAND  
SECURITY; JOHN KELLY, Secretary of  
Homeland Security; NATHALIE ASHER,  
Director of the Seattle Field Office of U.S.  
Immigration and Customs Enforcement,

Respondents.

**DECLARATION OF MARTIN M.  
FLORES IN SUPPORT OF  
PETITIONER'S RESPONSE BRIEF RE:  
COURT'S FEBRUARY 14, 2017, ORDER  
DIRECTING SERVICE, SETTING  
STATUS CONFERENCE, AND  
SETTING BRIEFING SCHEDULE**

1 I, Martín M. Flores, declare as follows:

- 2 1. I have spent the last ten years acting as a consultant on cases regarding gangs.
- 3 2. I have served on approximately 700 cases and testified over 175 times, including consulting  
4 on cases arising in the immigration context. I have worked on cases involving hundreds of  
5 street gangs generally. In addition, I have consulted and researched cases that involve the  
6 Mexican Mafia, Sureños, Norteños, prison gangs, and transnational gangs and the Mexican  
7 cartels.
- 8 3. In connection with this work, I have interviewed hundreds of gang members (active, non-  
9 active, and former) and their family members, examined hundreds of police reports on gangs,  
10 reviewed gang intelligence, analyzed phone calls and tattoos, and studied and researched  
11 books, articles, magazines, and internet reports on gangs.
- 12 4. I received a B.A. in Chicano Studies, with a minor in education and anthropology, from the  
13 University of California, Berkeley. I also pursued courses in community planning and  
14 education at the University of California, Los Angeles.
- 15 5. Prior to my involvement in criminal gang cases, I founded and served as Executive Director  
16 of the Rogelio Flores Foundation, which was established in memory of my youngest brother  
17 who was killed in a drive-by shooting in 1994. We provided our services to the community of  
18 Los Angeles in a lower socioeconomic area addressing education, recreational, mentorship,  
19 and health needs of youth.
- 20 6. I also served as a Community Programs Coordinator for underserved youth in Inglewood,  
21 California, and served for over a decade as the Executive Director and Youthful Offender  
22 Director of an organization in Los Angeles to implement gang intervention and prevention  
23 programs. In this position, I participated in Gang Task Force Meetings and Subcommittees,  
24 met with law enforcement and community leaders on public safety, and advocated for at-risk  
25 youth.
- 26 7. Through my prior work and extensive testifying and case involvement experience, my areas  
27 of expertise include gang structures; gang politics; interpreting tattoos; identification of hand  
28 signs, symbols, and codes; differentiating gang-motivated crimes from personal crimes;

1 identifying gang members from individuals part of the same neighborhood; and other  
2 applicable areas.

3 8. In addition to a number of other gangs, I am familiar with the Sureños. I have studied this  
4 gang, including its tattoos and symbolism.

5 9. The term "paisa" is commonly used to refer to people who are recent immigrants and non-  
6 gang members. In fact, the word "paisa" is found in the name of many businesses including  
7 restaurants, tire shops, etcetera. It is shortened from the word "paisano" which translates to  
8 countryman, or an inhabitant of a rural or remote area who is usually characterized by an utter  
9 lack of sophistication and cultivation.

10 10. I have reviewed photographs of Mr. Daniel Ramirez Medina's tattoo, which refers to "La  
11 Paz," "BCS" and has an image of a five-pointed star.

12 11. In my extensive experience with gang-related symbols and tattoos, I would not identify this  
13 tattoo as gang-related. I have never seen a gang member with a similar tattoo nor would I  
14 attribute this tattoo to have any gang-related meaning.

15 12. In particular, this tattoo does not match any of the Sureño symbolism or tattoos that I have  
16 studied. Sureño gangs commonly have an identifier of "13" along with their gang name. Mr.  
17 Ramirez does not have any symbol of "13." This tattoo also does not match any symbolism  
18 or tattoos that I have seen among gangs that have members who refer to themselves as  
19 "paisas."

20 13. I have done extensive research on gangs in various counties including Tulare County where I  
21 understand that Mr. Ramirez grew up. There are no gangs in that area that have the name or  
22 symbols of "La Paz" or "BCS."

23 14. The five-pointed star appears to be a nautical star, an extremely common tattoo that  
24 symbolizes the sea and is very popular with the Navy servicemen and others.

25 15. It is my personal, educational, and professional experience that recognizes that young people  
26 who live in communities where there is gang activity have regular encounters and interactions  
27 with gang members. That does not indicate that they are gang involved, but rather a reality  
28 that exists within their respective communities. It is common to interact with a gang member

1 through classmates, family members, neighbors, teammates and friends of friends. This  
2 interaction by itself does not indicate gang membership nor gang association.  
3

4 I declare under penalty of perjury under the laws of the United States that the foregoing is true  
5 and correct.

6 Executed this sixteenth day of February, 2017, in Los Angeles, California.

7  
8 By: 

9 Martin M. Flores  
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